

Exhibit 65:

K.S. Deposition Transcript (redacted)

K. S.
May 31, 2023

1 (Pages 1 to 4)

2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G, H,
MARY DOE and MARY ROE, on behalf of
themselves and all others similarly
situated.

Plaintiffs,

vs.

Case No. 2:22-10209
Hon. Mark A. Goldsmith

GRETCHEN WHITMER, Governor of the State of Michigan and COL. JOSEPH GASPER, Director of the Michigan State Police, in their official capacities.

Defendants.

DEPOSITION OF: K.S.
LOCATION: Remote Location
DATE: Wednesday, May 31, 2023
TIME: 10:00 a.m.

Taken remotely in the above-entitled cause, before
Stefanie S. Pohl, Certified Shorthand Reporter, CSR 5616,
and Notary Public for the County of Clinton.

APPEARANCES:

LAUREN CARBAJAL, ESQUIRE
Lovey & Lovey
311 North Aberdeen Street
3rd Floor
Chicago, Illinois 60607
Appearing on Behalf of the Plaintiffs.

SYEDA F. DAVIDSON, ESQUIRE
American Civil Liberties Union of Michigan
2966 Woodward Avenue
Detroit, Michigan 48201-3035
Appearing on Behalf of the Plaintiffs.

SCOTT L. DAMICH, ESQUIRE
Assistant Attorney General
Michigan Department of Attorney General
State Operations Division
525 West Ottawa Street
P.O. Box 30754
Lansing, Michigan 48909-8254
Appearing on Behalf of the Defendants.

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I N D E X

WITNESS: PAGE:
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Examination by Mr. Damich 4

EXHIBITS:	MARKED:
Defendants' Deposition Exhibit A	12
(Declaration)	

Defendants' Deposition Exhibit B (Mail-In registration)	65
Defendants' Deposition Exhibit C (Scenario descriptions)	66

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1 Wednesday, May 31, 2023
2 10:00 a.m.
3 Remote Videoconference

4 K. S.,
5 a Witness herein, after having first been duly sworn
6 remotely, testified as follows:

EXAMINATION

8 BY MR. DAMICH:
9 Q Good morning, sir. My name is Scott Damich. I'm an
10 Assistant Attorney General with the State of Michigan,
11 and I represent Governor Whitmer and Colonel Gasper.
12 And I Noticed your deposition in this case which is
13 named Does versus Whitmer, and has a specific case
14 number 2:22-CV-10209, and it's in the District Court in
15 the Eastern District of Michigan, and it's pending in
16 front of the Honorable Judge Goldsmith.

17 Now, there's a Protective Order in place in this
18 case, sir. The Protective Order is another fancy word
19 of a device that we are using to make sure that your
20 identity does not escape the record at all. The public
21 will not know of your name, your full name, or any
22 personal identifying information.

23 Now, that Protective Order, it's found -- it's
24 found at ECF No. 88, page ID 23892395.

25 And, again, like I said, it protects your identity.

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2 (Pages 5 to 8)

<p style="text-align: right;">5</p> <p>1 Will the court reporter confirm that she has read 2 the Protective Order and signed the acknowledgement? 3 COURT REPORTER: Yes, I have. 4 THE WITNESS: I'm sorry? 5 MR. DAMICH: Okay. And then will counsel 6 affirm that the person tendered is in fact Declarant 7 K.S.? 8 MS. CARBAJAL: Yes. 9 MR. DAMICH: Okay. 10 Q (By Mr. Damich) Sir, have you ever been deposed 11 before? 12 A Yes, many years ago. 13 Q Okay. So just -- we'll go over the ground rules real 14 quick and just -- it will probably set the stage of how 15 I like my depositions to go. I like to treat them as a 16 conversation. 17 Now, I get it, it's a weird conversation because 18 I'm the only one asking questions here. It's a 19 one-sided conversation, with you answering. Now, 20 another thing that's special about this conversation is 21 that we have a court reporter here, Stefanie, who's 22 writing everything down that we say verbally. 23 So, for example, you just nodded your head yes, and 24 you're understanding. If I ask you a question that is 25 asking for a yes/no answer, nodding your head yes won't</p>	<p style="text-align: right;">6</p> <p>1 make it into the transcript. We need you to verbalize 2 yes and verbalize no. 3 Does that make sense? 4 A Yes. 5 Q Okay. Also, a hard -- I can imagine a hard thing for 6 Stefanie to do is transcribe what we call cross-talk. 7 For example, if you're answering a question and I jump 8 in and try to talk over you, that's cross-talk. And 9 that -- I can't even imagine how hard that would be for 10 Stefanie to go through and untangle who said what, 11 when, where, and what the heck they said. So we're 12 going to try our best to avoid cross-talk if possible. 13 So just a couple of things to keep in mind. If you 14 let me get my questions out before you answer them, 15 that would be great. You're represented by counsel 16 today who more likely than not will have objections to 17 some of my questions. I suggest that you wait until 18 she gets her objections out, and then give your answer, 19 and I will do my best to hold off in interjecting. 20 I am human, I will make mistakes sometimes, but I 21 will usually cut myself off, and let you get your full 22 answer out. 23 Now, here's the thing: My goal today is not to 24 trick you into anything and get you into any kind of 25 gotcha moment. It's not. I'm simply just trying to</p>
<p style="text-align: right;">7</p> <p>1 get some facts and line some facts up here. So I'm not 2 going to ask you any -- my goal is not to ask you any 3 tricky questions. 4 So, if there's a question that I ask you that you 5 don't understand, you got to tell me. You got to say, 6 Scott, I don't know what you're getting at, could you 7 please rephrase the question, that's confusing, you're 8 not making sense. Please tell me that. 9 And with that in mind, if you do answer the 10 question or any questions that I ask you, is it fair -- 11 is it a fair rule that you understood the question that 12 was asked of you; does that make sense? 13 A Yes, it does. 14 Q Excellent. And I know even before the deposition 15 started, I thanked you for letting me know that you 16 have some hearing issues. So, again, I'm going to do 17 my best to speak slowly, articulate as loud as I can, 18 without disrupting my colleagues and having them yell 19 at me. And -- and make sure you hear every word that 20 comes out of my mouth. 21 But, going back to what I said previously, don't 22 guess that you heard what I said. Let's confirm it 23 first before we get it on the record. 24 I'm not in the business of trying to see how long 25 you can sit still in the same seat for extended periods</p>	<p style="text-align: right;">8</p> <p>1 of time. If you want to a break even after I'm done 2 with my little soapbox talk here, that's fine. The 3 only caveat that I have is when you want to take a 4 break, is that if I ask you a question, if you could 5 give an answer to the question before we go ahead and 6 say let's take five, ten minutes. Is that fair? 7 A Yes, it is. 8 Q Excellent. Okay. Are you taking any medications or 9 any substances that affect your memory or ability to 10 answer truthfully today? 11 A No. 12 Q Is there anything else that might interfere with your 13 ability to answer questions truthfully and fully today? 14 A No, not that I can think of. 15 Q Okay. Now, you previously mentioned that you were 16 deposed before. Is that correct? 17 A Yes. 18 Q And, you said it was years ago. Do you have an 19 approximation of how many years ago it was? 20 A About 30 -- 33 years ago. 21 Q What was it in relation to? 22 A That was -- I was a plaintiff in a civil lawsuit. 23 Q And who did you sue? 24 MS. CARBAJAL: Sorry. Objection. I'm just 25 going to object to anything that invokes the name of</p>

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<p style="text-align: right;">9</p> <p>1 this lawsuit just because it might impede on that</p> <p>2 Protective Order and give you information about his</p> <p>3 identity.</p> <p>4 MR. DAMICH: Sure.</p> <p>5 Q (By Mr. Damich) Okay. Let me rephrase the question.</p> <p>6 Did you sue an individual or did you sue a</p> <p>7 corporation?</p> <p>8 A No. In fact, I sued a [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 Q Were you a prisoner at the time you filed your suit?</p> <p>11 A Yes.</p> <p>12 Q And what did you think [REDACTED] did wrong to you?</p> <p>13 A It was about [REDACTED].</p> <p>14 Q Okay. So it was prison conditions?</p> <p>15 A Yes.</p> <p>16 Q Okay. Do you remember the outcome of that lawsuit?</p> <p>17 A Yes.</p> <p>18 Q In what way?</p> <p>19 A I won.</p> <p>20 Q Congratulations. So when you say you won, what did the</p> <p>21 Court order the warden to do?</p> <p>22 A The Court ordered that the [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 Q Now, you filed that while you were in prison, and I</p>	<p style="text-align: right;">10</p> <p>1 think it's a great segue here to talk about what's</p> <p>2 going to be the substance of our conversation today and</p> <p>3 what it's going to surround.</p> <p>4 From my understanding, you were -- you were</p> <p>5 convicted twice of CSC, criminal sexual conduct,</p> <p>6 correct?</p> <p>7 A Yes.</p> <p>8 Q Okay. And, so, throughout this deposition, I'm going</p> <p>9 to -- when I talk about your CSC conviction in the</p> <p>10 singular, I'm speaking of the later one of the two, the</p> <p>11 1985 conviction. Is that fair?</p> <p>12 A Yes.</p> <p>13 Q And when I want to speak about both convictions, I'll</p> <p>14 make sure to say it in the plural. And when I'm</p> <p>15 talking about both convictions, I'm going to be talking</p> <p>16 about the 1978 and 1985 convictions.</p> <p>17 Does that make sense to you?</p> <p>18 A Yes.</p> <p>19 Q Okay. Now, you -- do you remember signing a</p> <p>20 declaration for this case?</p> <p>21 A Yes.</p> <p>22 Q And before we get into that, what's your understanding</p> <p>23 of what's at issue in the current lawsuit?</p> <p>24 A My understanding is that it has to do with the</p> <p>25 Registry.</p>
<p style="text-align: right;">11</p> <p>1 Q Okay. Is that the extent of your understanding or do</p> <p>2 you know of anything else about the claims being made</p> <p>3 against my clients?</p> <p>4 A Well, I did read the claims section of the complaint</p> <p>5 and review it just for purposes of relevancy.</p> <p>6 Q Okay.</p> <p>7 A You know, for my deposition. That's it.</p> <p>8 Q Okay. So in addition to reading the complaint, did you</p> <p>9 do anything else to prepare for today?</p> <p>10 A The only thing that I did to prepare for today was I</p> <p>11 believe I had four telephone conferences with Lauren.</p> <p>12 Q Okay. Did you bring anything with you to today's</p> <p>13 deposition?</p> <p>14 A No.</p> <p>15 Q Okay.</p> <p>16 A No, sir.</p> <p>17 Q Okay. I'm going to share my screen with you. And</p> <p>18 hopefully this works out for both of us.</p> <p>19 And let me know when you see a document show up on</p> <p>20 your screen.</p> <p>21 A Oh, yes. Okay, I see the Declaration.</p> <p>22 Q Okay. You see that?</p> <p>23 A Yes.</p> <p>24 Q I'm going to scroll down and you see that it has the</p> <p>25 K.S. here, at the signature line?</p>	<p style="text-align: right;">12</p> <p>1 A That's correct.</p> <p>2 Q This is your Declaration?</p> <p>3 A This is my Declaration, yes.</p> <p>4 MR. DAMICH: I'd like to mark this as</p> <p>5 Deposition Exhibit A.</p> <p>6 (Whereupon Defendants' Deposition Exhibit A</p> <p>7 was marked for identification.)</p> <p>8 THE WITNESS: I'm sorry?</p> <p>9 Q (By Mr. Damich) I was just telling the court reporter</p> <p>10 that I would like to have this marked as a deposition</p> <p>11 exhibit. Just some lawyer talk. That's all.</p> <p>12 A Yup. Okay.</p> <p>13 Q Okay. In the first paragraph there you talk about a</p> <p>14 CSC-3 conviction in 1978?</p> <p>15 A Yes.</p> <p>16 Q That's criminal sexual conduct in the third degree,</p> <p>17 correct?</p> <p>18 A Yes.</p> <p>19 Q All right. What did you do?</p> <p>20 A I molested a child who was between the age of 13 and</p> <p>21 15, I believe. This was a plea-based sentence.</p> <p>22 Q So, when you say molestation -- you molested the child,</p> <p>23 did you sexually penetrate the child?</p> <p>24 A Yes.</p> <p>25 Q Okay. And do you know whether the child was between</p>

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<p style="text-align: right;">13</p> <p>1 the ages of 13 and 16?</p> <p>2 A I believe the child was 13 at the time.</p> <p>3 Q Okay. Were you related to the child?</p> <p>4 A No.</p> <p>5 Q Did you have any type of personal relationship with the</p> <p>6 child?</p> <p>7 A Yes.</p> <p>8 Q And what was that personal relationship?</p> <p>9 A The child would come over to my house for</p> <p>10 companionship.</p> <p>11 Q Was the child a neighbor?</p> <p>12 A Yes.</p> <p>13 Q Were you friends with the parents?</p> <p>14 A I'm sorry?</p> <p>15 Q Were you friends with the child's parents?</p> <p>16 A They knew about me, but I wasn't really friends of the</p> <p>17 parents.</p> <p>18 Q Okay. And how old were you?</p> <p>19 A How old was I?</p> <p>20 Q Yes.</p> <p>21 A At the time, 31.</p> <p>22 Q And the child -- and the child was 13?</p> <p>23 A That's correct.</p> <p>24 Q Did you have a lot of friends that were 13 years old at</p> <p>25 that time?</p>	<p style="text-align: right;">14</p> <p>1 MS. CARBAJAL: Objection. Form.</p> <p>2 THE WITNESS: I'm sorry?</p> <p>3 Q (By Mr. Damich) Did you have a lot of 13-year-old</p> <p>4 friends when you were 31?</p> <p>5 MS. CARBAJAL: Same objection.</p> <p>6 THE WITNESS: Do I answer this?</p> <p>7 Q (By Mr. Damich) Yes.</p> <p>8 MS. CARBAJAL: Yes.</p> <p>9 THE WITNESS: Okay. No.</p> <p>10 Q (By Mr. Damich) Okay. At the age of 31, were you</p> <p>11 employed?</p> <p>12 A Yes.</p> <p>13 Q What were you doing at the age of 31?</p> <p>14 A I was working for the [REDACTED] [REDACTED].</p> <p>15 Q Okay. Did part of your job responsibilities lead --</p> <p>16 allow you to come into contact with this child?</p> <p>17 A I'm sorry, say again?</p> <p>18 Q How did you become friends with this child?</p> <p>19 A The child simply came to my house and saw me painting</p> <p>20 my house, and we just struck up a conversation, and it</p> <p>21 went on from there.</p> <p>22 Q Did the child consent?</p> <p>23 A Yes. The -- yes.</p> <p>24 Q Do you think a 13-year-old child has a mental capacity</p> <p>25 to consent to sexual activity?</p>
<p style="text-align: right;">15</p> <p>1 A At the time I assumed so, because the child was no</p> <p>2 stranger to having sex with adults, I discovered; but</p> <p>3 that doesn't excuse my behavior.</p> <p>4 Q Sure. How many other adults was she having sex with in</p> <p>5 your estimation?</p> <p>6 MS. CARBAJAL: Objection to form.</p> <p>7 THE WITNESS: Oh, could you please repeat the</p> <p>8 question so I can answer?</p> <p>9 Q (By Mr. Damich) Sure. To your knowledge, how many</p> <p>10 other individuals did the 13-year-old have sex with</p> <p>11 before she had sex with you?</p> <p>12 MS. CARBAJAL: Same objection, and</p> <p>13 argumentative.</p> <p>14 THE WITNESS: Honestly, I have no idea.</p> <p>15 Q (By Mr. Damich) Do you if any other individuals were</p> <p>16 charged with criminal sexual conduct for their sexual</p> <p>17 activity with a 13-year-old child?</p> <p>18 MS. CARBAJAL: Objection to form.</p> <p>19 THE WITNESS: Yes.</p> <p>20 Q (By Mr. Damich) There was?</p> <p>21 MS. CARBAJAL: Objection to form. Asked and</p> <p>22 answered.</p> <p>23 THE WITNESS: I have discovered since I went</p> <p>24 to prison that there were a number of people that</p> <p>25 committed the same kind of crime with -- with minors,</p>	<p style="text-align: right;">16</p> <p>1 with children. I greatly regret my criminal activity</p> <p>2 and I would certainly never approve of adult having --</p> <p>3 an adult having sex with a child. It was a form of</p> <p>4 insanity.</p> <p>5 Q (By Mr. Damich) Were you -- were you physically</p> <p>6 attracted to the 13-year-old at the time?</p> <p>7 MS. CARBAJAL: Objection to form.</p> <p>8 Argumentative.</p> <p>9 THE WITNESS: Do I answer this question?</p> <p>10 Q (By Mr. Damich) Yes.</p> <p>11 A Yes.</p> <p>12 Q Are you still attracted to 13-year-olds?</p> <p>13 A Oh, no.</p> <p>14 MS. CARBAJAL: Objection to form.</p> <p>15 Argumentative.</p> <p>16 Q (By Mr. Damich) When did -- at what age did -- when</p> <p>17 did your attraction end?</p> <p>18 MS. CARBAJAL: Objection to form and</p> <p>19 argumentative.</p> <p>20 THE WITNESS: I would say with an</p> <p>21 understanding of why I committed these offenses. I</p> <p>22 think this past term in prison, I learned a great deal</p> <p>23 about myself and what triggered that behavior.</p> <p>24 Q (By Mr. Damich) Okay. And what did you learn?</p> <p>25 A I learned that there were sociogenic and psychogenic</p>

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<p style="text-align: right;">17</p> <p>1 reasons why I committed the crime. I learned that 2 loneliness can act as a trigger, depression can be a 3 trigger. And, for some reason -- I don't hang around 4 children. I haven't been around children in any sense 5 of having contact with them since I went to prison. 6 There's no reason for it. No legitimate reason for it. 7 I honestly believe that I have no sexual attraction to 8 children at this time. I hope that answers your 9 question. 10 Q Uh-huh. And how did you get caught having sex with a 11 13-year-old? 12 A The child's father questioned the child, and the child 13 confessed the relationship and what went on with me. 14 Q In your opinion, what do you believe caused the father 15 to question the child? 16 MS. CARBAJAL: Objection. Form. Foundation. 17 THE WITNESS: I -- I'm just going to have to 18 guess at this because I really don't know. The father 19 may have been suspicious of the child's relationship 20 with me. 21 Q (By Mr. Damich) Okay. What do you think would cause 22 his suspicion? 23 MS. CARBAJAL: Objection to form. Foundation. 24 THE WITNESS: Honestly, I don't know. I just 25 can't give -- you see, we're looking for the truth</p>	<p style="text-align: right;">18</p> <p>1 here. So I don't know the truth of the situation as to 2 what triggered the father to talk to the child. 3 Q (By Mr. Damich) Okay. How many times did you have sex 4 with the child? 5 MS. CARBAJAL: Objection to form. 6 Argumentative. 7 THE WITNESS: Oh, numerous times. I would say 8 between six and 12 times. 9 Q (By Mr. Damich) Okay. And each time you knew that she 10 was 13-years-old? 11 A Yes. 12 MS. CARBAJAL: Object to form. Argumentative. 13 Q (By Mr. Damich) Okay. So, you were convicted in 1978. 14 Were you incarcerated after that? 15 A Yes. 16 Q For how many years? 17 A Precisely two years, seven months and 14 days. 18 Q So then what year would that have been that you got 19 out? 20 A 1980. June the 11th, I believe, 1980. 21 Q Were you placed on parole? 22 A I was placed on parole. 23 Q For how long? 24 A For two years, but I was released early from parole 25 because of the exemplary conduct on parole. The system</p>
<p style="text-align: right;">19</p> <p>1 is entirely different than what it is now. 2 Q And do you remember the terms of your parole at all? 3 A Do I -- excuse me? 4 Q Do you remember the terms of your parole at all? 5 A Yeah, yeah. Stay out of bars and don't threaten and 6 intimidate anyone. That's it. 7 Q Did you have to report -- 8 A The system was a lot different. 9 Q Did you have to report to a parole officer? 10 A At first, every month. 11 Q Okay. 12 A Then after about four months, he said I really don't 13 need to see you this often. You can see me every three 14 months. 15 Q Did you have to contact your parole officer before 16 applying to new jobs? 17 A The parole officer would ask about my employment when I 18 reported. 19 Q Okay. 20 A And would have appreciated it, and did appreciate it, 21 when I reported employment that occurred between my 22 visits with him. The system was entirely different. 23 Q Sure. Did you have to report your -- where you were 24 living? 25 A Yes.</p>	<p style="text-align: right;">20</p> <p>1 Q And were you tracked at all? 2 A I'm sorry? 3 Q Were you tracked at all, were there any tracking -- 4 A No. 5 Q -- devices at that point? 6 A No. 7 Q I don't think there was back then. 8 Okay. Did you achieve employment after your 9 release? 10 A After I was released in 1980? 11 Q Uh-huh. 12 A Yes. 13 Q Okay. Where did you obtain employment? 14 A I obtained employment almost immediately after I was 15 released in prison by applying to the [REDACTED], 16 [REDACTED], program that was 17 existing at that time in [REDACTED]. 18 Q Okay. So you found employment through your local -- 19 through a program provided for through your local 20 county? 21 A Yes. It was still a popular program and well funded to 22 help people who were disadvantaged find training and 23 employment. 24 Q And how long did you stay with that program? 25 A I stayed with that program until the -- until Ronald</p>

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<p style="text-align: right;">21</p> <p>1 Reagan entered and cancelled the [REDACTED]. He -- 2 he -- he simply ended it, ended its funding, and then I 3 had to move on. 4 Q Do you know -- do you have -- do you have an idea what 5 year that was? 6 A I'm sorry, do I have any idea of -- 7 Q What year that was? 8 A 1981. 9 Q And did you find any employment after that? 10 A Yes. 11 Q Okay. Where -- what type of work did you find? 12 A Administrative work. 13 Q Okay. Was that almost immediately after the program 14 was ended? Was that -- did you obtain your new job 15 doing administrative work after Ronald Reagan entered 16 -- ended the program you previously referenced? 17 A Yes. 18 Q Okay. And how quickly did you obtain employment? 19 A Well, it seemed -- it was -- it was almost 20 serendipitous because where I was working, there was a 21 company that was just starting up that did home energy 22 analysis. And when I lost my position with the [REDACTED] 23 program that was functioning in that same building, 24 this other company quickly picked up on those people 25 who were losing their jobs with the [REDACTED] program. And</p>	<p style="text-align: right;">22</p> <p>1 I applied and was accepted into employment with that 2 other company. 3 Q And how long did you stay with that company? 4 A Until I was arrested for my current crime. 5 Q And that was in 1985, right? 6 A 1984. 7 Q When you were arrested, okay, yeah. 8 A Yes. 9 Q Convicted in 1985, correct? 10 A Correct, convicted in 1985 at the end of June, I 11 believe. You'll have to excuse me, I have repressed 12 much of this. It's an inclination that I just wanted 13 to get on with my life. 14 Q Sure. Understandable. 15 Did you graduate from high school? 16 A Yes. 17 Q And do you have a college degree? 18 A Yes. 19 Q Which -- what do you have -- what's your college degree 20 in? 21 A It's a Baccalaureate of Philosophy in the behavioral 22 sciences. 23 MS. CARBAJAL: Scott, can we go briefly off 24 the record for a second? 25 MR. DAMICH: Yeah. Sure.</p>
<p style="text-align: right;">23</p> <p>1 (Discussion off record.) 2 MR. DAMICH: Okay. Back on the record. 3 Q (By Mr. Damich) So you have an undergraduate degree in 4 philosophy and behavioral sciences? 5 A No. It was a Ph.B, Ph.B, a Baccalaureate of Philosophy 6 in the behavioral sciences from [REDACTED]. 7 Q Got you. Got you. And when did you graduate? 8 A 1972. 9 Q All right. Did you go on to further education? 10 A No. I -- well, I there were financial problems that 11 precluded my further education. 12 Q Okay. So then when you graduated undergrad, did you 13 find employment? 14 A Yes, but with great difficulty because of Affirmative 15 Action. And, at the time, there was a quota that 16 certain ethnic groups were to be given primary 17 consideration, and I ran up against that time after 18 time after time. 19 Q So you -- so Affirmative Action prevented you from 20 obtaining graduate -- a graduate degree? 21 A That -- no, it actually prevented me from finding 22 meaningful employment for a while. 23 Q Oh, okay. I'm sorry. You're right. I switched over, 24 I went back to education. I meant employment. So, 25 Affirmative Action prevented you from employment?</p>	<p style="text-align: right;">24</p> <p>1 A And, I discovered -- now, we're going back to 1972. 2 Q Sure. Yeah. 3 A There was a [REDACTED] 4 [REDACTED], program where I was at that time living, and I was 5 picked up for employment. Again, this time, public 6 administration. 7 Q And this is all pre-conviction, right, all -- 8 A This is -- correct. 9 Q So you said there was great difficult -- great 10 difficulty. How long did you stay unemployed? 11 A I -- actually when I was employed through the [REDACTED] 12 program at that time, I stayed on for two years. There 13 was a sunset provision that encouraged you to leave the 14 [REDACTED] program to find employment in the regular business 15 sector. 16 After the [REDACTED] employment, I was able to find a job 17 with the [REDACTED], and I was with 18 that job until my arrest in 1977 for the first crime. 19 Q Did you have any trouble finding places to live between 20 the years of your graduation from undergrad and then 21 the years you were incarcerated? 22 A No. 23 Q Where did you live? 24 Before you answer, don't give me a specific 25 location.</p>

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7 (Pages 25 to 28)

<p style="text-align: right;">25</p> <p>1 A I lived in the city of [REDACTED] at the time I 2 graduated from college, and then -- 3 Q So -- 4 A I'm sorry? 5 Q Okay. So, you lived in, is it fair to say you lived on 6 the eastern -- the southeastern part of the State of 7 Michigan? 8 A That's correct. 9 Q Did you rent or own at that time? 10 A Rent. 11 Q Okay. And then in 1978, you were convicted and 12 incarcerated, and then -- 13 A Yes, I was convicted in 1978 and incarcerated. 14 Q And then in 1985 you were convicted of two counts of 15 CSC-1, correct? 16 A That's correct. 17 Q Okay. Back to your declaration I see that, you know, 18 it says that you -- in the first sentence, it says you 19 were convicted of CSC-3 in 1978 and CSC-2 in 1985. 20 So, just to be clear, it was two counts of CSC-1 in 21 1985, right? 22 A That's as I recall, yes 23 MS. CARBAJAL: Form. 24 Q (By Mr. Damich) Okay. What did you do this time? 25 A This time my crime was that I molested three of the</p>	<p style="text-align: right;">26</p> <p>1 children, and a neighborhood child -- three of the 2 children of my very best friends. 3 You have to understand this is very difficult for 4 me, because I live with this every night, every day, 5 24/7. I live with the betrayal of my friends, and I 6 hate to talk about it over and over and over again. I 7 hate to revisit it. 8 Q Okay. 9 A There's nothing I can do to take back my crime. 10 Q Sure. Okay. So, just to go back to the crime, you 11 said that you molested three of the children of your 12 best friend? 13 A Yes. 14 Q And, so, there were only two counts of CSC -- of CSC-1, 15 right? 16 A That's correct. 17 Q Do you remember, were there any counts that were 18 dropped or charges that were dropped? 19 A There was one count that was dropped because the child 20 refused to cooperate with the prosecution. 21 Q So, again, how many children? 22 A There were three -- 23 MS. CARBAJAL: Objection to form. Asked and 24 answered. 25 THE WITNESS: -- plus the neighborhood child.</p>
<p style="text-align: right;">27</p> <p>1 I'm sorry, but is this all necessary? 2 Q (By Mr. Damich) Yes. So you said there were three and 3 a neighborhood child? 4 MS. CARBAJAL: Objection. Asked and answered. 5 Q (By Mr. Damich) So there were four overall then? 6 A Yes. 7 Q Okay. And what were their ages at the time? 8 A 13, 11 and eight. 9 Q So there were four overall, but you only gave me three 10 ages. Is there one age -- 11 A There were two that were twins, born on the same day. 12 Q Okay. Which one was that, what age? 13 A They were 11. 14 Q Okay. And what ages were the ones -- the three of your 15 -- three of the children of your very best friend? 16 A Excuse me. I have got to get rid of this phone. I had 17 it turned off, and it keeps on ringing through. And I 18 don't want that interference. 19 MS. CARBAJAL: Let's go off the record for a 20 second. 21 MR. DAMICH: That's fine. 22 MS. CARBAJAL: Okay. 23 (Brief recess.) 24 THE WITNESS: Okay. I'm back. I don't 25 understand why that keeps ringing through.</p>	<p style="text-align: right;">28</p> <p>1 MR. DAMICH: That's okay. 2 MS. CARBAJAL: All right. Back on the record. 3 Q (By Mr. Damich) Okay. Before we went off the record, 4 we had identified the ages of the four victims of your 5 sex -- of your second conviction. They were 13, 11, 11 6 and eight. 7 And out of those four individual children, I had 8 asked you what three were the three of your very best 9 friends, if you could identify them by ages? 10 A The -- the two 11-year-olds, and the eight-year-old. 11 Q Okay. And then did you have any -- a special 12 relationship with the 13-year-old? 13 MS. CARBAJAL: Objection to form. 14 THE WITNESS: Yes. 15 Q (By Mr. Damich) What was your special relationship 16 with the 13-year-old? 17 MS. CARBAJAL: Objection to form. 18 Argumentative. 19 You can answer. 20 THE WITNESS: The 13-year-old was friends with 21 the 11-year-old -- one of the 11-year-olds. 22 Q (By Mr. Damich) Did your very best friend know about 23 your prior conviction? 24 MS. CARBAJAL: Objection to form. 25 Argumentative.</p>

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<p style="text-align: right;">29</p> <p>1 THE WITNESS: I honestly don't think so.</p> <p>2 Q (By Mr. Damich) Do you think if he -- if he or she</p> <p>3 would have known about your prior conviction that they</p> <p>4 might not have let their children around -- around you,</p> <p>5 or at least by themselves with you?</p> <p>6 MS. CARBAJAL: Objection to form. Calls for</p> <p>7 speculation and argumentative.</p> <p>8 THE WITNESS: Do I still answer it?</p> <p>9 Q (By Mr. Damich) Yes.</p> <p>10 MS. CARBAJAL: You do.</p> <p>11 THE WITNESS: If they had known of that</p> <p>12 conviction, no. I think they would have been much more</p> <p>13 careful about the supervision of their children around</p> <p>14 me.</p> <p>15 Q (By Mr. Damich) What ways do you think they'd be able</p> <p>16 to find out about your prior conviction?</p> <p>17 A I'm sorry?</p> <p>18 Q What ways would they have been able to find out about</p> <p>19 your prior conviction back then?</p> <p>20 MS. CARBAJAL: Objection to form. Vague.</p> <p>21 Calls for speculation.</p> <p>22 THE WITNESS: They would have had to -- well,</p> <p>23 they would have had to have inquired. I mean, there</p> <p>24 was no way that they would have known unless I had told</p> <p>25 them.</p>	<p style="text-align: right;">30</p> <p>1 Q (By Mr. Damich) Okay. And, so, at that point, you</p> <p>2 were still attracted to children under the age of 13,</p> <p>3 correct?</p> <p>4 A Yes.</p> <p>5 MS. CARBAJAL: Objection to form.</p> <p>6 Argumentative.</p> <p>7 Q (By Mr. Damich) That was a yes, right?</p> <p>8 A The answer was yes.</p> <p>9 Q Okay. And how old were you in 1985?</p> <p>10 A Well, back when I was arrested, 39.</p> <p>11 Q Did you sexually penetrate each of those four children?</p> <p>12 A Yes.</p> <p>13 Q On multiple occasions?</p> <p>14 A Yes.</p> <p>15 Q Did you have other children watch while you performed</p> <p>16 the --</p> <p>17 A No.</p> <p>18 MS. CARBAJAL: Objection to form, assumes</p> <p>19 facts not in evidence.</p> <p>20 Q (By Mr. Damich) So you had sex with them individually?</p> <p>21 MS. CARBAJAL: Objection to form.</p> <p>22 Argumentative.</p> <p>23 THE WITNESS: Yes.</p> <p>24 Q (By Mr. Damich) Was this usually done at your home?</p> <p>25 A I was living at the home of my very best friends at</p>
<p style="text-align: right;">31</p> <p>1 that time. My very best friends were working at the</p> <p>2 same company I was working at.</p> <p>3 Q Okay.</p> <p>4 A And we had all been laid off by the company, so we were</p> <p>5 all in need of finding other employment. And they</p> <p>6 invited me into their home as a gesture of kindness</p> <p>7 until we all got back on our feet financially.</p> <p>8 Q How did you get caught?</p> <p>9 A One of the children happened to be discussing a</p> <p>10 molestation event with her girlfriend. And that</p> <p>11 triggered Protective Services to come in, and then the</p> <p>12 Michigan State Police.</p> <p>13 Q And then you -- how long of a prison sentence were you</p> <p>14 given?</p> <p>15 A I was given a prison sentence of 20 years to 40 years</p> <p>16 by arguably one of the finest and fairest judges in</p> <p>17 [REDACTED].</p> <p>18 Q And how many years did you serve in prison --</p> <p>19 A I served 28 years out of 40 years.</p> <p>20 Q So you were 67 when you were released?</p> <p>21 A 67.</p> <p>22 Q Okay. And what year was that?</p> <p>23 A That was August the 29th, 2012.</p> <p>24 Q Were you placed on parole?</p> <p>25 A That's the date when I was paroled.</p>	<p style="text-align: right;">32</p> <p>1 Q And how long were you on parole?</p> <p>2 A Two full years and, of course, I wore a tether all of</p> <p>3 that time.</p> <p>4 Q And what does a tether do?</p> <p>5 A The tether advised my parole agent of my whereabouts 24</p> <p>6 hours a day, seven days a week.</p> <p>7 Q Okay.</p> <p>8 A All sex offenders were required -- were required to</p> <p>9 wear them, and I believe still are required to wear</p> <p>10 them.</p> <p>11 Q Did you also have to submit to drug testing?</p> <p>12 A I'm sorry?</p> <p>13 Q Did you have to submit to drug testing?</p> <p>14 A Yes, I did, although that was ludicrous.</p> <p>15 Q And how about alcohol, were you allowed to drink</p> <p>16 alcohol?</p> <p>17 A All of that was done every time I reported, I had to do</p> <p>18 a urine drop.</p> <p>19 Q What were some of the other requirements of parole this</p> <p>20 time?</p> <p>21 A I was required to look for employment, and all of us as</p> <p>22 a general rule were largely on house arrest. We were</p> <p>23 given specific time to go out to seek employment, and</p> <p>24 on the weekends we were pretty much forbidden to be out</p> <p>25 on the weekends, unless we had a specific religious</p>

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<p style="text-align: right;">33</p> <p>1 activity, or we wanted to do our laundry. 2 But we had to make sure that our agents always knew 3 where we were. We had to ask for permission before we 4 left our residences each and every time. 5 Q Were your electronic devices monitored? 6 A Such as? 7 Q Yeah, for example, like your computer usage, was that 8 monitored? 9 A We weren't allowed to use computers, only at Michigan 10 Works. I wasn't allowed to have a computer at all. It 11 was kept in storage for two years. 12 Q So you came off parole you stated in 2016? 13 A I'm sorry, I ended parole in 2014. 14 Q Sorry. 2014. I'm sorry. Thank you for clarifying. 15 If we could go back to Exhibit A, your Declaration. 16 In number three, it says: Since my release from prison 17 in 2012, I've submitted more than 3,000 job 18 applications. 19 A Yes. 20 Q How many job applications -- how many job applications 21 did you submit while you were on parole? 22 A For an entire period of -- of roughly nine years, I 23 submitted job applications repeatedly -- repeatedly. 24 Often -- as often as I could. I intensified the job 25 search when I was allowed to have a computer again in</p>	<p style="text-align: right;">34</p> <p>1 2014. And for the next five years, I spent hours a day 2 online applying for jobs. 3 Q So in your first -- so in 20 -- in 2012, how many jobs 4 do you think you applied to, approximately? 5 A In 2012, I may have applied, between 2012 and 2013, to 6 maybe a dozen different prospective employers. But the 7 parole rules were so tough, I actually wound up where I 8 was living doing odd job work for the land -- for the 9 property manager where I lived. And that kept me busy, 10 and gave me some kind of below minimum wage employment 11 for about two years. I did a lot of restorative work 12 in the various units that were rented and vacated over 13 that two-year period. 14 Q Back to the exhibit here, it says at number four that 15 you were hired to work at a Federal government job 16 training program in 2015, called Experience Works. 17 Do you see that? 18 A Yes. 19 Q That was after you were off of parole, correct? 20 A That was off -- yes, after I was off of parole. 21 Q And do you know when in 2015 you got that job? 22 A I got that job in -- around the first of February in 23 2015. 24 Q And then when did -- do you remember the approximate 25 date that you came off of parole?</p>
<p style="text-align: right;">35</p> <p>1 A It had to be the end of August, the 29th or the 30th. 2 Q Of 2014, correct? 3 A That's correct. 4 Q Okay. 5 A Yes. 6 Q So that's a six-month gap there between employment, 7 correct, between the time of your coming off of parole 8 and the time that you got your job in February 2015? 9 Does that sound about right? 10 A That's right. That's correct. 11 Q Were you employed then? 12 A Was I employed at the -- I'm sorry, say it again? I 13 don't understand the question. 14 Q Between the month of August 2014 and February 2015, 15 were you employed? 16 A No, I don't recall being employed. 17 Q Okay. 18 A At that time. 19 Q Then what did -- what did you do to survive? What was 20 your source of income? 21 A Okay. My source of income was a very small Social 22 Security retirement check that came in every month. At 23 the time I believe it was a little bit less than \$1,100 24 a month. 25 Q You had no other sources of income?</p>	<p style="text-align: right;">36</p> <p>1 A The only other sources of income that I may have had at 2 that time were doing odd jobs, cutting lawns, painting 3 people's homes on the outside, power washing their 4 homes, whatever. 5 Q Okay. You were like 69 years old at that time, right, 6 approximately? 7 A I would say yes, and I was able to purchase my home 8 just before my 70th birthday, at the end of 2014. 9 Q How much income did you have in 2022? 10 A I'm sorry. Say it again? 11 Q How much income did you have in 2022? 12 A I had -- I had just -- I was -- I've got to guesstimate 13 at this -- around 16,000. 14 MS. CARBAJAL: Scott? 15 MR. DAMICH: Yes. It's about an hour and I 16 feel like there's about -- we have like a meeting at 17 10:00 every day. It's going to explode in sound. Can 18 we take a quick break? 19 MR. DAMICH: Absolutely. Absolutely. What do 20 you want, maybe ten minutes? 21 MS. CARBAJAL: Yeah. Ten minutes would be 22 great. 23 MR. DAMICH: All right. So then let's do 24 11:10, we'll see each other again. 25 MS. CARBAJAL: Thank you so much.</p>

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10 (Pages 37 to 40)

<p style="text-align: right;">37</p> <p>1 MR. DAMICH: See you soon. Of course. 2 (Brief recess.) 3 MR. DAMICH: Back on the record. 4 Q (By Mr. Damich) I want to go ahead and tighten up your 5 housing both pre and post your second conviction. 6 Could you remind me previous -- I think you 7 previously testified that you were living somewhere 8 before your second conviction. Did you -- was that a 9 house or an apartment? 10 A What time frame are we talking? 11 Q So that would be between -- between your -- that would 12 be right before you got arrested for your second 13 conviction, where were you living? 14 A I was living with my best friends. 15 Q Were your best friends located in Michigan? 16 A Yes. 17 Q Okay. And then were your best friends, would you say 18 it's fair to say, in southeast part of Michigan? 19 A Here in central Michigan. 20 Q Central Michigan, okay? 21 A Yup. 22 Q So you were renting? 23 A Yes. 24 Q Then when you were released from prison for your second 25 conviction, and that would be in 2012, where did you go</p>	<p style="text-align: right;">38</p> <p>1 to live? 2 A I was placed in temporary housing by and through the 3 Department of Corrections. The parole office was 4 involved in -- in placing me where I ultimately stayed 5 for about two years until I was off of parole. 6 Q So did you rent? 7 A I did rent. 8 Q Okay. 9 A Yes. 10 Q And did you live in central Michigan? 11 A Yes. 12 Q So you were living in central Michigan post-release, 13 we'll say from 2012 to 2014? 14 A Yes. 15 Q Okay. And then 2014, what happened? Where did you 16 move? 17 A At the end of 2014, I was able to get on a computer, 18 and, amazingly, very quickly I discovered what they 19 call a Land Bank program, a county Land Bank program. 20 And they were selling rehabbed housing for a very 21 reasonable amount of money. And I was blessed by being 22 able to purchase the home where I live now, and that 23 was at the end of 2014. The closing was in December of 24 2014. It's been a blessing. 25 Q So from December 2014 until today, you were living in a</p>
<p style="text-align: right;">39</p> <p>1 home that you purchased? 2 A That's correct. 3 Q And today you're located in that home right now? 4 A That's correct, yes. 5 Q Do you know the fair market value of your home 6 currently? 7 A Say again? 8 Q The current fair market value of your home? 9 A I have worked hard to improve the value of the home. 10 I'm going to guesstimate about 85,000. 11 Q Okay. 12 A I've put a lot of work into it. 13 Q From the time you released in 2012 until present day, 14 did you spend any time homeless? 15 A No, thank God. I had to purchase my home because no 16 one would rent to me. 17 Q So did you have trouble finding suitable housing 18 because of your CSC history? 19 A Absolutely. The Registry. It was always the Registry. 20 Q Okay. So my question was about the -- your criminal 21 sexual conduct history, not the Registry. 22 So, did you have trouble finding suitable housing 23 because of your criminal sexual conduct history? 24 A No. 25 Q Okay.</p>	<p style="text-align: right;">40</p> <p>1 A The Registry at the time forbade me to live in certain 2 areas. So I couldn't find a home or apartment to rent 3 in many different areas, you know, where I live 4 currently, because of the restrictions about having 5 registered sex offenders in those geographical areas. 6 I purchased the home I have now because it lay outside 7 of those restricted areas. 8 Q So even with those restricted areas, you were able to 9 find your current home? 10 A That's correct, yes. 11 Q Approximately how many apartment complexes did you 12 apply to for -- to live? 13 A I'm sorry, I would have to guess at that answer. I 14 might say two dozen. 15 Q Two dozen? 16 A I don't think that's unreasonable, 24 or 25. And, 17 after awhile, you just give up. 18 Q Okay. Do you remember were they paper applications? 19 A I'm sorry? 20 Q Were they paper applications? 21 A These were paper applications and they were always 22 turned down. 23 Q Okay. 24 A Because of the Registry, and because other tenants 25 would protest my presence there.</p>

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11 (Pages 41 to 44)

<p style="text-align: right;">41</p> <p>1 Q Do you remember if the applications specifically asked 2 if you were on the Sex Offender Registry? 3 A I think that -- I think that maybe six or seven of them 4 did. They might have also asked about criminal 5 background. 6 Q So did all of them ask about criminal background? 7 A Yes. 8 Q Okay. But not all of them asked about your Registry 9 status, correct? 10 A This was a knee-jerk reaction to a movement called Ban 11 the Box, and employers in the area made an end run 12 around that movement. Ban the Box was an employer 13 can't ask questions about criminal background before 14 the applicant has a chance to apply and be given some 15 kind of consideration before they slam the door. 16 Well, then apartment renters followed this trend 17 and they wanted to make sure that anyone who applied 18 for rent was carefully examined as far as criminal 19 background. 20 Q So, my question was: Did all the applications ask 21 whether or not you were on the Registry? 22 A I'm certain that if I -- if I review from the 23 standpoint of memory, every one of the applications 24 wanted to know about criminal background. 25 Q Do you remember, if any --</p>	<p style="text-align: right;">42</p> <p>1 A It was frustrating to realize that I wasn't eligible 2 for any kind of subsidized housing at the State or 3 Federal level. 4 Q Why do you believe you didn't qualify for subsidized 5 housing? 6 A Again, it had to do with the Registry. As I recall, 7 looking into it from the Federal standpoint, registered 8 sex offenders were not allowed to participate in ETA 9 funding. This all happened around 2014. We even had a 10 Federal senator who wanted to remove sex offenders from 11 having food stamps, and, thank God that didn't go 12 through. I'm sorry. 13 Q Okay. So for housing -- I just to make sure we tighten 14 up your employment, too. 15 So you were employed between -- you were employed 16 before your first conviction, correct? 17 A That's correct. 18 Q And approximately how much were you making a year 19 before you were -- your first conviction? 20 A \$10,000 a year. 21 Q Now, for the time period between your first conviction 22 and second conviction, you found employment, correct? 23 A Yes. 24 Q Okay. How many different employers did you have 25 between that time period?</p>
<p style="text-align: right;">43</p> <p>1 A After I got out of prison the first time? 2 Q Correct. 3 A Three. 4 Q Starting with the first, how -- approximately how much 5 did you make a year? 6 A Maybe \$7,000. 7 Q Okay. And then how about your second employer, how 8 much were you making per year? 9 A They were all within that range, 7,000 to 8,000. 10 Q And the same was true for your third employer? 11 A And my third employer, about the same. We -- this was 12 a time when you just -- people were making \$6 an hour. 13 Q Yeah. Okay. So then let's go to the period after you 14 were released for your second conviction. You were 15 released in 2012. 16 Let's go through your employment history since 17 then. In -- what was your first position post-release? 18 A The first employment -- 19 Q Yes. 20 A -- that I had was Northwest Initiative, and that was 21 \$8.90 an hour, maybe \$8.35 an hour, and it was 22 part-time. Anywhere from 16 to 20 hours a week. 23 Q Were you receiving any governmental benefits? 24 A Yes, my Social Security retirement. 25 Q Approximately how much was that?</p>	<p style="text-align: right;">44</p> <p>1 A Between a thousand and \$1100 per month. That kept the 2 wolf from the door. 3 Q Okay. So that was your first -- first job, that was 4 about 8.75 per hour. Did you have a job after that? 5 A A job after -- 6 Q So post-release, you said you got a job making 8.75 per 7 hour, right, in 2012? 8 A In -- in 2015, that was my first real bonafide job with 9 [REDACTED]. That lasted about four years. 10 Q So between 2012 and 2015, did you just live off of 11 governmental benefits and just side jobs? 12 A That's correct, and some odd jobs. 13 Q Any other jobs, other than the 8.75 per hour? 14 A I left [REDACTED] at the end of 2018 because 15 there was a sunset provision that compelled me to leave 16 after four years. I applied to a government -- a 17 company which had government contracts. And I worked 18 as a [REDACTED] operator for four months 19 thereafter. 20 Q And what was your salary at that position? 21 A That [REDACTED] position gave me \$11 an hour on 22 third shift. 23 Q And then are you still working at that job? 24 A Say again, please? 25 Q Are you still working that job?</p>

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<p style="text-align: right;">45</p> <p>1 A Oh, that job lasted four months.</p> <p>2 Q Okay. Why did you leave?</p> <p>3 A I was exhausted, physically exhausted. I couldn't take</p> <p>4 it, you know, that any more. It was a sweat shop.</p> <p>5 Q So, it didn't have anything to do with your status as a</p> <p>6 sex offender?</p> <p>7 A Oh, absolutely. They would only hire me as a</p> <p>8 registered sex offender if I worked on midnights. So</p> <p>9 I'd have no contact with any of the good people.</p> <p>10 Q Okay. And that caused you to be exhausted?</p> <p>11 A If you'd seen what I had to do, yes.</p> <p>12 Q Okay. So then where did you go from there?</p> <p>13 Actually, before you answer -- before you answer</p> <p>14 that, let me ask you this.</p> <p>15 A I'm sorry?</p> <p>16 Q Yeah -- no, never mind, scratch that. After your job</p> <p>17 at -- that you left after four months, did you find --</p> <p>18 A I applied to several jobs.</p> <p>19 Q Did you file any kind of complaints with any kind of</p> <p>20 governmental agencies for the way you were treated at</p> <p>21 your previous jobs?</p> <p>22 A I filed no claim against the [REDACTED] company.</p> <p>23 Q Did you ask to be switched back to the day shifts at</p> <p>24 all?</p> <p>25 A They would not allow me to work on day shift.</p>	<p style="text-align: right;">46</p> <p>1 Q Did you ask?</p> <p>2 A Yes, and the answer was no. You're a registered sex</p> <p>3 offender. Quote, this is how we handle sex offenders.</p> <p>4 Q Okay. And then from that position, where did you go?</p> <p>5 A I mainly did odd -- odd jobs, but while I was doing</p> <p>6 those, I was constantly applying for work via the</p> <p>7 computer, using various different job sites, including</p> <p>8 the Federal job site, State jobs, city jobs, county</p> <p>9 jobs, all of them, basically, seeking administrative</p> <p>10 work.</p> <p>11 Actually, I would have even have been happy to have</p> <p>12 been a parking lot attendant, anything to have a job.</p> <p>13 Ultimately, I found a job at -- at the end of October</p> <p>14 in 2020.</p> <p>15 Q Okay. And then where did you find that job at?</p> <p>16 A [REDACTED] And that lasted until February, at the end of</p> <p>17 February of 2021.</p> <p>18 Q Why did you leave?</p> <p>19 A They claimed they just got my background report from</p> <p>20 their background investigation people, a company known</p> <p>21 as Hire Right. I saw the Hire Right report that was a</p> <p>22 result of Hire Right's background investigation two</p> <p>23 days after I had my first interview.</p> <p>24 They claim they didn't get the background report</p> <p>25 until the end of February, 2021. They said, oh, it was</p>
<p style="text-align: right;">47</p> <p>1 accidentally put in the spam file. And at that time</p> <p>2 they said, well, your background doesn't meet company</p> <p>3 standards.</p> <p>4 Q The background being -- being convicted of having sex</p> <p>5 with four children?</p> <p>6 MS. CARBAJAL: Objection to form.</p> <p>7 Argumentative.</p> <p>8 THE WITNESS: I was told it was because of the</p> <p>9 Registry, that it was a liability -- an insurance</p> <p>10 liability to have me work there.</p> <p>11 Q (By Mr. Damich) Okay. Do you know -- did you fill out</p> <p>12 a paper application for [REDACTED]?</p> <p>13 A I filled out applications for [REDACTED] and during the</p> <p>14 onboarding process, I took the hiring assistant who</p> <p>15 stood over my shoulder, and I said, look at what I'm</p> <p>16 inputting. This is my criminal background.</p> <p>17 She said, oh, we're not going to worry about that</p> <p>18 until the background report comes in. They were</p> <p>19 desperate to have anyone work for them because this was</p> <p>20 still during the pandemic. Nobody wanted to work. So</p> <p>21 they were willing to hire anybody they could,</p> <p>22 provisionally, to have employees in the store.</p> <p>23 Q Provisionally on the running of a background check?</p> <p>24 A Right.</p> <p>25 Q And so then you did report your felonies on your</p>	<p style="text-align: right;">48</p> <p>1 application?</p> <p>2 A Absolutely.</p> <p>3 Q Okay.</p> <p>4 A It's a matter of record.</p> <p>5 Q Sure. In that application, do you remember if it asked</p> <p>6 if you were a current sex offender, or if you were on a</p> <p>7 Registry?</p> <p>8 A I'm sorry, say again. What?</p> <p>9 Q Sure. Do you remember whether or not the [REDACTED]</p> <p>10 application had a specific question asking you: Are</p> <p>11 you currently on Michigan Sex Offender Registry?</p> <p>12 A No. I can't recall that on the application. They</p> <p>13 didn't want -- they had a certain block on the</p> <p>14 onboarding process where they asked about past criminal</p> <p>15 convictions. And I filled that in, and pointed it out.</p> <p>16 It was very comprehensive. They were more interested</p> <p>17 in hiring me because they needed a body to come in to</p> <p>18 work. I'm sorry, that's -- it's fairly obvious to me.</p> <p>19 Q Is it your understanding that you have to commit an</p> <p>20 underlying offense to be placed on Michigan Sex</p> <p>21 Offender Registry?</p> <p>22 A It's my understanding that I had to be a convicted sex</p> <p>23 offender to get on the Registry. I guess there are</p> <p>24 exceptions, you know, which are strange. I don't want</p> <p>25 to -- we don't discuss those.</p>

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13 (Pages 49 to 52)

<p style="text-align: right;">49</p> <p>1 Q Sure. So is it fair to say that [REDACTED] might not have 2 hired you because of your prior convictions, not 3 because of your placement on the Registry? 4 A My impression when they fired me was that they got the 5 background report from Hire Right, and in the Hire 6 Right report, there is a very specific subsection that 7 addresses Sex Offender Registry. 8 As I recall the report, I don't have a copy of it, 9 I'm sorry, when they discovered that I was on the 10 Registry, there was a little red flag on the report. 11 And under that red flag, the -- Hire Right advised 12 [REDACTED] that I didn't meet company standards. 13 That whole report was -- which I had a copy of it 14 two days after I applied and onboarded, their copy of 15 the report, they say was lost for four months until the 16 end of February. When they discovered it, after they 17 found it, they immediately fired me. 18 Q It, being the report from a third-party contractor? 19 A That's correct, from Hire Right. 20 Q Okay. So is it fair to say that Hire Right's report 21 caused you to be fired? 22 A Yes. 23 Q Are you married? 24 A No. 25 Q Do you have any children?</p>	<p style="text-align: right;">50</p> <p>1 A No. 2 Q Do you have any siblings? 3 A All of my family is dead. 4 Q So you don't have any nieces or nephews? 5 A If they're still alive, I haven't had contact with them 6 in maybe 30 years. 7 Q Okay. All right. Sorry I got off track there with 8 your employment. So, when Meijer decided to let you 9 go, did you find employment after that? 10 A I did. But -- as a matter of fact, it was kind of 11 serendipitous. I have a [REDACTED] who takes care of 12 [REDACTED] for me. And one day he called and 13 said, [REDACTED] help. And I said, what? And he said, I 14 need someone to deliver [REDACTED] I'm desperate, 15 will you help me. And I said certainly. 16 By that time, he was fully informed about my entire 17 criminal background. I've discussed my entire criminal 18 background with my employer and his wife, co-owners of 19 a small [REDACTED] where I live. And they were so 20 forgiving. They have found out that I'm very 21 trustworthy since they have contracted with my 22 services. 23 Q Okay. So then when did your relationship with this 24 company begin? 25 A This employer, it began around October the 18th, 2021,</p>
<p style="text-align: right;">51</p> <p>1 and I'm currently employed -- well, I mean, in a matter 2 of sense, I'm currently employed with them now. 3 Q Okay. So then, before you left your job with [REDACTED] 4 how much were you making? 5 A Before I lost my job with [REDACTED] Oh, brother. Total 6 income including my Social Security, about 13,000 -- 7 1300 a month. Wait a minute. Hold on. No, it would 8 be probably a little over 2000 a month. 9 Q And that's -- is that including your Social Security 10 benefits? 11 A Yes, that includes my Social Security benefits. My 12 work with [REDACTED] was also part-time. They didn't 13 really allow work, anyone to work full-time, because 14 they didn't want to pay the benefits. 15 Q Now, fast forwarding to your current pharmacy job, how 16 much do you make now? 17 A It varies depending upon how many hours I put in and 18 the mileage they pay me. 19 Q I think previously you had testified you made 20 approximately 16,000 a year? 21 A Right now that would be -- that would be now over 22 20,000 a year. 23 Q Okay. Does that come with benefits? 24 A No, no benefits. 25 Q So since your release from prison, you've been steadily</p>	<p style="text-align: right;">52</p> <p>1 employed, right? 2 A I -- I don't know if you'd call it steadily employed. 3 I mean, I participated in a job training program for 4 maybe three or four hours a day, five days a week. And 5 then I had full-time employment very shortly with 6 operating a sewing machine. And then I was unemployed 7 for -- wow -- from 2019 until the end of 2020. 8 So I don't -- how would you call that, you know, 9 regularly employed or consistently employed? Now, I 10 have been consistently employed at the [REDACTED] 11 part-time, for 19 months, without benefits. 12 Q And you're currently 78 years old? 13 A 78, that's correct. 14 I'll be right back. I'll be right back. 15 (Discussion off the record.) 16 Q (By Mr. Damich) Do you belong to any social clubs or 17 anything? 18 A I am currently on the -- on the Executive Board or 19 Organizing Board of a small [REDACTED] called [REDACTED] 20 [REDACTED] [REDACTED] And we -- we meet once a week, and we 21 have participants who are often on parole, or not, but 22 many of whom are registered sex offenders and people 23 who have anger management problems, and -- and people 24 who have addictions or substance abuse problems. 25 Q Okay. Any other -- what else do you do in your spare</p>

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<p style="text-align: right;">53</p> <p>1 time?</p> <p>2 A Actually, I have five kitty kids and a home, and</p> <p>3 gardens and lawns that take up huge amounts of my time.</p> <p>4 I'm OCD, so everything about my home and my property</p> <p>5 and my lawns and my 30 rose bushes have to be perfect.</p> <p>6 Q Now, do you find, I know you said you feel like you</p> <p>7 have OCD, but do you actually find enjoyment in doing</p> <p>8 that stuff though?</p> <p>9 A The amount of time that I spend doing recreational</p> <p>10 activities amounts to trying to watch TV for two hours</p> <p>11 a night before I go to bed, because I'm constantly</p> <p>12 busy.</p> <p>13 Q That's good to be constantly busy between taking care</p> <p>14 of your house, your yard, your cats, and then, of</p> <p>15 course, with the organization you helped start,</p> <p>16 correct?</p> <p>17 A That's correct.</p> <p>18 Q Okay.</p> <p>19 A I'm always available for people who call who need help</p> <p>20 in one way or another. So I have people coming and</p> <p>21 going from my property almost daily, before work, and</p> <p>22 in between times when I'm not out there doing work or</p> <p>23 painting the house or doing something.</p> <p>24 Q So you have a pretty solid friend base, then?</p> <p>25 A Yes.</p>	<p style="text-align: right;">54</p> <p>1 Q Even with -- even with your prior convictions and even</p> <p>2 with being on the Registry, you're able to maintain, it</p> <p>3 sounds like you have good friends. In fact, you said</p> <p>4 people come by daily, right?</p> <p>5 A Well, many of these --</p> <p>6 MS. CARBAJAL: Objection. Asked and answered</p> <p>7 THE WITNESS: I'm sorry?</p> <p>8 MS. CARBAJAL: Objection -- objection asked</p> <p>9 and answered. Mischaracterizing the testimony, but you</p> <p>10 can answer the question.</p> <p>11 THE WITNESS: Many of the people that come</p> <p>12 over are former sex offenders who have rehabilitated</p> <p>13 themselves, and demonstrated that they don't have any</p> <p>14 proclivities towards reoffending.</p> <p>15 I have neighbors who are not convicted sex</p> <p>16 offenders and who definitely know about my convictions,</p> <p>17 because before I moved into this home, I started</p> <p>18 knocking on doors and telling that I was a convicted</p> <p>19 sex offender.</p> <p>20 It's interesting that, whimsically, I say that no</p> <p>21 one has burned any crosses on my front lawn, or slashed</p> <p>22 my tires, or written ugly comments across my garage</p> <p>23 door. I am not reviled by my neighbors, thank God.</p> <p>24 They've come to know me.</p> <p>25 Q (By Mr. Damich) So, in general, you've been able to</p>
<p style="text-align: right;">55</p> <p>1 enjoy life? So, in general, you've been able to enjoy</p> <p>2 life?</p> <p>3 A I am blessed with an amazing ability to be able to</p> <p>4 enjoy life in spite of the millstone around my neck of</p> <p>5 being a registered offender. Not many people have</p> <p>6 succeeded, if you want to call it success, like I have,</p> <p>7 because I'm determined.</p> <p>8 Q Okay. Now, you had --</p> <p>9 A There's a religious thing here, a spiritual thing. My</p> <p>10 whole life is devoted to God. That's all I can say.</p> <p>11 It's very important that I follow what I consider to be</p> <p>12 God's will, doing good things, and that's what I do,</p> <p>13 seven days a week.</p> <p>14 Q So you didn't --</p> <p>15 MS. CARBAJAL: So --</p> <p>16 MR. DAMICH: Pardon me?</p> <p>17 MS. CARBAJAL: Sorry. We have to do the whole</p> <p>18 switch-a-roo thing. Can we take another 10-minute</p> <p>19 break?</p> <p>20 MR. DAMICH: Actually, perfect timing. That</p> <p>21 will bring us back right at noon, so that works for me.</p> <p>22 MS. CARBAJAL: Okay. Great. Awesome. We'll</p> <p>23 see each other at noon.</p> <p>24 (Brief recess.)</p> <p>25 Q (By Mr. Damich) We're back on the record.</p>	<p style="text-align: right;">56</p> <p>1 Before we took a quick break there, in one of your</p> <p>2 answers you had made mention that SORA is a millstone</p> <p>3 around your neck. Do you remember that?</p> <p>4 A Yes.</p> <p>5 Q Okay. How often do you have to -- how often do you</p> <p>6 have to register or verify a person with law</p> <p>7 enforcement?</p> <p>8 A I must register every three months for the rest of my</p> <p>9 life. And if there are any changes in my situation,</p> <p>10 I'm required to register those changes. If I get a</p> <p>11 different license plate, if I get a different car, if I</p> <p>12 get a different email address, if I get a different</p> <p>13 phone number. It's just on and on and on.</p> <p>14 Q Sure. Now, when you go to report -- when you go do</p> <p>15 your Registry every three months, where do you go?</p> <p>16 A I go to the police station where I live to report.</p> <p>17 Q How far away is the police station?</p> <p>18 A Two and a half miles.</p> <p>19 Q Okay. Can you give me an approximation of how long you</p> <p>20 usually spend there whenever you're registering?</p> <p>21 A 15 minutes to a half-hour normally.</p> <p>22 Q So would you say it's usually like an hour long ordeal,</p> <p>23 couch, back to couch, right, by the time you get in the</p> <p>24 car, drive to the place, the station?</p> <p>25 A Yup.</p>

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15 (Pages 57 to 60)

<p style="text-align: right;">57</p> <p>1 Q Register, and you're back at your home within an hour?</p> <p>2 A Right.</p> <p>3 Q Okay. So you spend four hours out of the year</p> <p>4 registering?</p> <p>5 A If you want to put it down to that, yes.</p> <p>6 Q All right. So, March of 2021, on how many occasions</p> <p>7 have you had to update your information?</p> <p>8 A Well, I had to update my information when I had my</p> <p>9 sewing job, and, with [REDACTED] it wasn't required that</p> <p>10 I report it because that was during COVID. And I had</p> <p>11 to update my job with the pharmacy.</p> <p>12 Q So, twice?</p> <p>13 A I'm sorry?</p> <p>14 Q So twice you've had to do that?</p> <p>15 A I had to update my Registry when -- with the pharmacy</p> <p>16 job.</p> <p>17 Q And then also with the sewing job, right?</p> <p>18 A Yes.</p> <p>19 Q So that was two separate instances where you had to</p> <p>20 update, right?</p> <p>21 A That's correct.</p> <p>22 Q Okay. And both of those --</p> <p>23 A I also had to update when I got my car.</p> <p>24 Q Okay.</p> <p>25 A And changes in license plate.</p>	<p style="text-align: right;">58</p> <p>1 Q That was a third instance since 2021 you had to change,</p> <p>2 right -- or submit updated changes, correct?</p> <p>3 A Yeah.</p> <p>4 Q Any other instances?</p> <p>5 A I can't recall any --</p> <p>6 Q Okay.</p> <p>7 A -- offhand.</p> <p>8 Q When you did those updates, did you go in person?</p> <p>9 A Yes.</p> <p>10 Q Okay. I want to go ahead and share my screen with you</p> <p>11 again real quick.</p> <p>12 Do you recognize -- okay. Do you recognize this</p> <p>13 document by chance?</p> <p>14 A I don't -- I'm not aware -- I see it, but, no, I knew</p> <p>15 nothing about this.</p> <p>16 Q Okay. So you're not aware that some updates can be</p> <p>17 done via mail-in, you can mail in your updates?</p> <p>18 A No, I was not aware of that. I'm trying to look at</p> <p>19 this now.</p> <p>20 Q Want me to zoom in for you so you can see it better?</p> <p>21 A It's okay, I can see it. I'm just looking for -- it</p> <p>22 doesn't ask anything about employment. There's no</p> <p>23 section for employment update, which is interesting.</p> <p>24 Q Yeah. Is there anything on this form, except for the</p> <p>25 lack of, you know, when you said this could be a lack</p>
<p style="text-align: right;">59</p> <p>1 of employment section that's confusing to you?</p> <p>2 A No. It looks like the same stuff that I have on my</p> <p>3 paperwork when I go in to register. This information</p> <p>4 would be able to be pulled off of that form.</p> <p>5 Q So there's nothing confusing about the offender</p> <p>6 information requested, what's a temporary residence,</p> <p>7 any other contact information -- contact information</p> <p>8 called for there under three, vehicles, mobile homes,</p> <p>9 none of that's confusing to you?</p> <p>10 MS. CARBAJAL: Objection to form. Compound.</p> <p>11 And mischaracterizes the testimony.</p> <p>12 THE WITNESS: Oh, I just notice a little</p> <p>13 section there below contact information where it says,</p> <p>14 the following email Internet information is only</p> <p>15 collected for those with offenses committed on or after</p> <p>16 July 1st, 2011.</p> <p>17 So I -- I'm not even required to report any</p> <p>18 changes in emails, which I didn't know. That's all I</p> <p>19 have to say.</p> <p>20 Q (By Mr. Damich) So you have -- so you have been</p> <p>21 including your email in identifiers whenever you go to</p> <p>22 update and everything?</p> <p>23 A I'm sorry, I didn't understand. What?</p> <p>24 Q So, you have -- you have been submitting your email and</p> <p>25 Internet identifiers?</p>	<p style="text-align: right;">60</p> <p>1 A I -- there's been no need for me to update that because</p> <p>2 my email has been the same since 2012.</p> <p>3 Q Okay.</p> <p>4 A As well as my phone number.</p> <p>5 Q Do you think the Sex Offender Registry protects the</p> <p>6 public in any way?</p> <p>7 A No.</p> <p>8 Q Previously you had testified if your very best friend</p> <p>9 had known of your prior conviction, then perhaps he</p> <p>10 wouldn't have trusted you to be around his three</p> <p>11 children before you sexually assaulted them.</p> <p>12 Had their information been on a Sex Offender</p> <p>13 Registry, do you think that perhaps that could have</p> <p>14 protected the three children from your actions?</p> <p>15 MS. CARBAJAL: Objection to form. And calls</p> <p>16 for speculation.</p> <p>17 THE WITNESS: I honestly don't know how to</p> <p>18 answer the question. I just don't know.</p> <p>19 Q (By Mr. Damich) Okay. Again, I'm just reminding you</p> <p>20 previously testified that had your very best friend</p> <p>21 known about your prior actions, that he would not have</p> <p>22 entrusted, that perhaps he would not have entrusted his</p> <p>23 children with you. Do you remember that?</p> <p>24 A Yes, I do, and that -- that really was on me. That</p> <p>25 should have been on me to, you know, disclose that</p>

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16 (Pages 61 to 64)

<p style="text-align: right;">61</p> <p>1 information.</p> <p>2 Q Right.</p> <p>3 A How could I call him very best friend when I didn't</p> <p>4 disclose that information?</p> <p>5 Q And, had he known that information, don't you think the</p> <p>6 chances are that he would not have let his children</p> <p>7 around you?</p> <p>8 MS. CARBAJAL: Objection to form.</p> <p>9 THE WITNESS: Again, I just don't know how to</p> <p>10 answer the question. I'm sorry.</p> <p>11 Q (By Mr. Damich) I think previously you -- I think you</p> <p>12 already answered the question. You said that you</p> <p>13 wouldn't -- that you think that he wouldn't allow them</p> <p>14 to be around you?</p> <p>15 A Yes. I think had he known I was a sex offender, he and</p> <p>16 his wife would have given second thought to me being</p> <p>17 around their children.</p> <p>18 Q Sure.</p> <p>19 A At the same time, I don't think the Registry protects</p> <p>20 the public because it only takes three seconds to</p> <p>21 commit a sex crime.</p> <p>22 Q Okay. So if the parents had known about that</p> <p>23 information, perhaps they might have not let their</p> <p>24 children around you, and they could have been protected</p> <p>25 from being sexually assaulted, right?</p>	<p style="text-align: right;">62</p> <p>1 MS. CARBAJAL: Objection to form.</p> <p>2 Argumentative.</p> <p>3 THE WITNESS: If they had had prior</p> <p>4 information about me being a sex offender, it might</p> <p>5 have offered them some protection, I guess. I just</p> <p>6 don't know.</p> <p>7 Q (By Mr. Damich) And then --</p> <p>8 A I'm sorry.</p> <p>9 Q And in your former --</p> <p>10 A I'm just guessing at this.</p> <p>11 Q Sure. And your friend is -- your friend and his</p> <p>12 children are members of the public, right?</p> <p>13 A My what?</p> <p>14 Q Your friend and his children are members of the public,</p> <p>15 right?</p> <p>16 A Yes, they are.</p> <p>17 Q And they would have been protected had they had that</p> <p>18 information, right?</p> <p>19 MS. CARBAJAL: Objection to form.</p> <p>20 THE WITNESS: Yes.</p> <p>21 Q (By Mr. Damich) So the Sex Offender Registry provides</p> <p>22 that information, correct?</p> <p>23 A It does, but I -- there must be other ways to provide</p> <p>24 that.</p> <p>25 Q So I guess I'm just confused on how you could say that</p>
<p style="text-align: right;">63</p> <p>1 the Sex Offender Registry does not protect the public</p> <p>2 in any way, where it could have very well prevented the</p> <p>3 very conviction that you had back in 1985.</p> <p>4 MS. CARBAJAL: Objection, form and</p> <p>5 argumentative. Also, was there question?</p> <p>6 THE WITNESS: This Registry and everything</p> <p>7 about it has me confused and it always will.</p> <p>8 Q (By Mr. Damich) Okay.</p> <p>9 A I'm sorry. The Registry is nothing but something that</p> <p>10 was invented using the punishment model. There's</p> <p>11 nothing about the Registry which shows any sign of</p> <p>12 restorative justice. It's all about punishment.</p> <p>13 There's no due process in the Registry to allow an</p> <p>14 offender to challenge ongoing registration or to be</p> <p>15 removed from it. And that's why it's so heinous to me.</p> <p>16 Obviously, not as heinous as my crimes. But when you</p> <p>17 don't give a person any due process to get away from</p> <p>18 that, then I have to wonder about society. And I have</p> <p>19 to wonder about the validity of the law that gives no</p> <p>20 due process.</p> <p>21 Q (By Mr. Damich) Have you ever given any thought to the</p> <p>22 mental impact that your victims have had on their lives</p> <p>23 since --</p> <p>24 A I've been dealing with it for 35 years, every time I</p> <p>25 look in the mirror.</p>	<p style="text-align: right;">64</p> <p>1 Q Do you think that the Sex Offender Registry may</p> <p>2 encourage victims to come forward?</p> <p>3 A I'm -- we're --</p> <p>4 MS. CARBAJAL: Objection. Calls for</p> <p>5 speculation.</p> <p>6 THE WITNESS: We're dealing with suppositions.</p> <p>7 I don't know. I have no idea. Would it? I don't</p> <p>8 know. Is it real? I don't know. Are we dealing with</p> <p>9 suppositions or reality? I can't answer the question.</p> <p>10 Q (By Mr. Damich) Okay. So if victims come forward to</p> <p>11 report sex crimes, does that protect the public?</p> <p>12 MS. CARBAJAL: Objection to form. Calls for</p> <p>13 speculation.</p> <p>14 THE WITNESS: These are tough questions to</p> <p>15 answer. I don't know. I would have to guess. I would</p> <p>16 have to suppose.</p> <p>17 Q (By Mr. Damich) Well, just in your opinion.</p> <p>18 MS. CARBAJAL: Same objections.</p> <p>19 THE WITNESS: I'm sorry. I just don't know.</p> <p>20 In my opinion as far as I'm concerned, my opinion means</p> <p>21 squat.</p> <p>22 I don't know if it would cause people to come</p> <p>23 forward. We certainly don't need that because we have</p> <p>24 all these programs that teach children in school what</p> <p>25 bad touches and good touches are, and encourage them to</p>

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17 (Pages 65 to 68)

<p style="text-align: right;">65</p> <p>1 come forward. We don't need the Registry for that.</p> <p>2 Q (By Mr. Damich) Okay. I'm going to go ahead and share</p> <p>3 my screen again.</p> <p>4 MS. CARBAJAL: Hey, let's take just like a</p> <p>5 quick five-minute break. It will be the quickest</p> <p>6 break, but --</p> <p>7 MR. DAMICH: Yeah. That's fine.</p> <p>8 MS. CARBAJAL: Thank you.</p> <p>9 (Brief recess.)</p> <p>10 MR. DAMICH: Back on the record.</p> <p>11 I'm going to go ahead and -- before I go</p> <p>12 ahead and reshare my screen, I would like to offer as</p> <p>13 Exhibit B the mail-in update and explanation form that</p> <p>14 the witness was testifying to earlier.</p> <p>15 And then so that would be Exhibit B.</p> <p>16 (Whereupon Defendants' Deposition Exhibit B</p> <p>17 was marked for identification.)</p> <p>18 Q (By Mr. Damich) So, now I'm going to reshare my</p> <p>19 screen, and let me know when it comes up. Okay. Can</p> <p>20 you see that, sir?</p> <p>21 COURT REPORTER: He's on mute. Just a second.</p> <p>22 MS. CARBAJAL: While he's on mute, I'm just</p> <p>23 going to put out the regular objection for this chart,</p> <p>24 for the reasons that have been articulated in briefing</p> <p>25 and before Judge Goldsmith, and I'm sure all the other</p>	<p style="text-align: right;">66</p> <p>1 previous depositions on this subject.</p> <p>2 MR. DAMICH: Noted. Thanks, Lauren.</p> <p>3 MS. CARBAJAL: You're welcome.</p> <p>4 Q (By Mr. Damich) Okay, sir. Do you see a new document</p> <p>5 on your screen?</p> <p>6 A I'm sorry, what?</p> <p>7 Q Do you see a new document on your screen?</p> <p>8 A Yes, I do, and I have been reading it.</p> <p>9 Q Okay. Now, what this document is, it's a collection of</p> <p>10 -- it's a chart with a collection of some judicial</p> <p>11 decisions. And in one of the blocks, you'll see</p> <p>12 recitation of some facts. And then you're going to see</p> <p>13 some case citations.</p> <p>14 What I intend to do with this exhibit is to have</p> <p>15 you read through some of these factual scenarios. And</p> <p>16 I'm going to have some questions for you about them.</p> <p>17 MR. DAMICH: And before we get there, I'm -- I</p> <p>18 would like to offer this in as Deposition Exhibit C.</p> <p>19 (Whereupon Defendants' Deposition Exhibit C</p> <p>20 was marked for identification.)</p> <p>21 Q (By Mr. Damich) All right. If you could go, I'm going</p> <p>22 to scroll down to number six. I'm also going to zoom</p> <p>23 in a little bit because it's a little -- can you read</p> <p>24 that, is that good?</p> <p>25 A Number six?</p>
<p style="text-align: right;">67</p> <p>1 Q Yes. Go ahead and read that to yourself and let me</p> <p>2 know when you're done.</p> <p>3 A Yes.</p> <p>4 Q Okay. Do you think your neighbors would want to know</p> <p>5 if this perpetrator lived next door to them?</p> <p>6 A Do I think?</p> <p>7 Q Yes.</p> <p>8 A Here we go again, thinking. Am I supposed to be</p> <p>9 putting my place in a hypothetical neighbor, and what</p> <p>10 they would be thinking? This is really stretching me,</p> <p>11 okay?</p> <p>12 But, I'm going to say that I would -- I think the</p> <p>13 neighbor would want to know how long ago the crime was</p> <p>14 committed, what kind of time the person spent in</p> <p>15 prison, what they've done to rehabilitate themselves,</p> <p>16 if you're currently employed, if they're currently</p> <p>17 married. I want to know if they've been able to</p> <p>18 recover their lives. It's called restorative justice.</p> <p>19 I don't know how to answer this question.</p> <p>20 Q You'd want to know that information in addition to the</p> <p>21 information that you read?</p> <p>22 A Yes.</p> <p>23 Q Okay.</p> <p>24 A Because we're not the same people we were 40 years ago.</p> <p>25 And something has -- you know, something has to give</p>	<p style="text-align: right;">68</p> <p>1 credence to, you know, what has -- what's happened in a</p> <p>2 person's life, how -- how they've changed. If this</p> <p>3 same individual hasn't made any progress, sure.</p> <p>4 But when someone has gone through so much as a</p> <p>5 result of their heinous behavior and come off the other</p> <p>6 side, and they're still alive, my question is</p> <p>7 irrelevant.</p> <p>8 Q Okay. So you think --</p> <p>9 A These are terrible crimes.</p> <p>10 Q Yeah. So --</p> <p>11 A But I still want to know what's happened to this</p> <p>12 perpetrator, what's going on in his or her life.</p> <p>13 Q Okay. And you would still want to know the facts that</p> <p>14 you read there, too, though, right?</p> <p>15 MS. CARBAJAL: Objection. Mischaracterizes --</p> <p>16 THE WITNESS: This is difficult because when I</p> <p>17 went around and talked to my neighbors, they did not</p> <p>18 want to know every lurid, sordid detail of my crime.</p> <p>19 I told them I was a sex offender. I told</p> <p>20 them I was registered. They seemed not to want to</p> <p>21 inquire deeper. However, many of the people in my</p> <p>22 neighborhood, older women, came to my home, enjoyed a</p> <p>23 cup of coffee, something to eat. And then told me that</p> <p>24 they had been sexually molested when they were girls.</p> <p>25 I don't know where you stick that information,</p>

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18 (Pages 69 to 72)

<p style="text-align: right;">69</p> <p>1 but, it was a continuing wake up call to how prevalent 2 molestation is, going back 60 and 70 years. I'm sorry, 3 I don't know what better answer to give your question. 4 Q (By Mr. Damich) And, so, you -- so, you actually 5 haven't felt stigmatized because of this sex offender 6 experience, you've actually found an increase in 7 friends? 8 MS. CARBAJAL: Objection. Mischaracterizes 9 the testimony. 10 THE WITNESS: I chose out of a sense of moral 11 obligation to let my neighbors know that I was a 12 convicted sex offender, and register. And -- and I let 13 the dominos drop wherever they fell, and decided that 14 I'd deal with the consequences of -- disclosing this to 15 my neighbors. 16 In the intervening eight years that I've lived 17 here, I've never had a problem with a neighbor. No one 18 calling me ugly names, no one, you know, shunning me. 19 I just don't know how to answer this. 20 Q (By Mr. Damich) We're going to scroll down to number 21 18, if you could read that one. 22 A Just horrific. So, we have two incidents, one of child 23 molesting and another of violent rape, which involve 24 entirely different states of mind, entirely different 25 psychological events going on. These are horrible.</p>	<p style="text-align: right;">70</p> <p>1 How long do you -- how long do you want to follow 2 that -- that offender? How long does this offender 3 have to pay for that horrible thing that he did, 4 including the time he spent in prison? Because I'm 5 sure he spent decades in prison. When does a person 6 ever find it possible to recover their lives? Ever? 7 Q Would you want to know this information if the 8 perpetrator lived next door? 9 A Emotionally, I'm going to say yes, but, I ask if this 10 has to be done through the Registry. There are ways 11 discovering what a person has done without the 12 Registry. 13 Q And what are those ways? 14 A Go online, Google the person. My God, you'll find 15 everything about them. If you don't know them, Google 16 them. You'll find a man in prison, what they've done. 17 You don't need the Registry. 18 Q So you don't need the Registry? 19 A As a matter of fact, this is done constantly. People 20 Google other people to see what they're like. So, no, 21 the Registry isn't necessary for this. Big Brother is 22 here; we don't need the Registry. 23 Q So you're saying the information is out there already 24 from other sources? 25 A Absolutely.</p>
<p style="text-align: right;">71</p> <p>1 Q Do you think that it's more prevalent in other sources 2 than the Registry? 3 MS. CARBAJAL: Objection. Foundation. Form. 4 THE WITNESS: I think the information is so 5 comprehensive that if anyone wanted the details they 6 could then go further. But the sources of information 7 about you and everything you do and everything you've 8 done, exist in maybe a hundred different websites. And 9 they're available all over the world. They're 10 accessible all over the world. We don't need the 11 Registry. 12 Q (By Mr. Damich) So then if SORA were to go away, 13 wouldn't the registered still have the same issues 14 then? 15 MS. CARBAJAL: Objection to form. 16 THE WITNESS: If the, what? 17 Q (By Mr. Damich) If the Registry itself were to go 18 away, and under your previous statements, the 19 information is already out there, aren't the registered 20 still going to experience the same difficulties? 21 MS. CARBAJAL: Objection to form. Foundation. 22 THE WITNESS: If the Registry goes away, then 23 registrants are able to recover their lives. They 24 can't now. There's no way. There's no due process 25 that allows a registrant to recover their lives as long</p>	<p style="text-align: right;">72</p> <p>1 as they're on the Registry. 2 Q (By Mr. Damich) Do you know whether or not Governor 3 Whitmer or Colonel Gasper has control over the 4 Internet? 5 MS. CARBAJAL: Objection to form, foundation. 6 THE WITNESS: Do I know if Governor Whitmer, 7 what? 8 Q (By Mr. Damich) Has control over the Internet? 9 A I would probably say no. 10 Q Okay. So, then, you had previously testified that 11 there's multiple other sources of where you could find 12 information outside of the Sex Offender Registry, 13 correct? 14 MS. CARBAJAL: Objection to form, foundation. 15 THE WITNESS: Governor Whitmer should never 16 have signed this into law. 17 Q (By Mr. Damich) Okay. But, again, to get back -- just 18 stay on track here, you did say that there's other 19 sources to find this information, right? 20 A Absolutely. 21 Q Absolutely. 22 A And they're incredibly comprehensive and revealing. 23 Q So then my question was: If SORA were to go away, 24 wouldn't the registrants have all the same problems, 25 right?</p>

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19 (Pages 73 to 76)

<p style="text-align: right;">73</p> <p>1 MS. CARBAJAL: Objection to form. 2 Foundation. 3 Q (By Mr. Damich) I don't know how -- I don't know how 4 people -- if removing SORA would give people their 5 lives back, if, in fact, all those other comprehensive 6 sources are still out there. Do you understand what 7 I'm saying? 8 MS. CARBAJAL: Objection to form and 9 foundation. Argumentative. 10 THE WITNESS: Yeah. It's a psychological 11 thing. And it also affects the family and the friends 12 of registered sex offenders. 13 I consider the Registry to be a millstone 14 around my neck. I consider it to be permanent 15 punishment. I might as well be back in prison. Some 16 people say, oh, it's just administrative. It's not 17 administrative. And we both know that if I were to 18 violate SORA, I would go back to prison. That's not 19 administrative at all, it's permanent punishment. 20 Q (By Mr. Damich) Do you renew your license every year? 21 A Pardon? 22 Q Do you renew your driver's license every year? 23 A I renew my driver's license every year. 24 I've got to do something with this. I don't 25 understand why this is still going through.</p>	<p style="text-align: right;">74</p> <p>1 MS. CARBAJAL: Do you need a second, K.S.? We 2 can take this -- 3 THE WITNESS: Okay. I've got it. I keep 4 getting these scam calls that come in every half hour, 5 all day long. I'm sure you know what I'm talking 6 about. 7 In any event, as long as the person is on the 8 Registry, they're never free. 9 Q (By Mr. Damich) Okay. So if you don't register -- if 10 you don't update your license every year -- driver's 11 license every year, is there a punishment for that? 12 A Is this even comparable to what we're talking about? I 13 mean, is this relevant to what we're talking about, 14 updating my driver's license? I don't think it has any 15 bearing to do with what we're talking about. 16 Q Sure. Is there any punishment if you don't update your 17 driver's license? 18 MS. CARBAJAL: Objection to form. 19 THE WITNESS: I am obligated to renew my 20 driver's license and registration every year. That 21 enables me to drive the car that I drive, in accordance 22 with the law. 23 Q (By Mr. Damich) Okay. 24 A That's a world apart from having to register every 25 three months in order to stay out of prison.</p>
<p style="text-align: right;">75</p> <p>1 Q Back to Exhibit 3, if you can read number 26, and let 2 me know when you're done. 3 A Okay. 4 Q Do you think this is information that your -- your -- 5 your former best friend would want to know about his 6 neighbor? 7 MS. CARBAJAL: Objection to form. 8 Argumentative. 9 THE WITNESS: I can't say anything more to you 10 than I've said about any of the other examples. You 11 know, if someone wants to know about who they're living 12 next to, all they have to do is know their name and 13 Google it. Believe me, it's there. 14 Q (By Mr. Damich) Even without the Registry, correct? 15 MS. CARBAJAL: Objection. Mischaracterizes 16 the testimony. 17 THE WITNESS: I'm sorry, even what? 18 Q (By Mr. Damich) Even without the Registry, correct? 19 A Even without the Registry -- 20 MS. CARBAJAL: Form. 21 THE WITNESS: -- the information is out there. 22 Q (By Mr. Damich) And that information -- 23 A Absolutely. 24 Q And that information is convictions of criminal sexual 25 conduct, correct?</p>	<p style="text-align: right;">76</p> <p>1 A There is a site called IChat, I-C-h-a-t. 2 Q Okay. 3 A Anyone can access it, anyone can subscribe to it and 4 get the background information of anyone in the State 5 of Michigan. You don't need the Registry. 6 Q Okay. But again, back to 26, would you want to know 7 this information about your neighbor? It's just yes 8 or no? 9 A No. 10 Q You would not want to know it? 11 A I have other ways of finding out about my neighbor. 12 And it's -- you know, it's there and available for 13 everyone. This is the age of instant information. The 14 Registry just is nothing but punitive. 15 Q Okay. If you could read number 33, and let me know 16 when you're done. 17 A These are all scenarios that have been on TV, and every 18 crime show that you can probably lock on to, you know. 19 You've got 90 percent of television is crime show TV. 20 All of this stuff is on TV, and it's all available when 21 people want to find out about their neighbors. Go on 22 the Google, go on to IChat. 23 These are all horrible things. 24 Q Okay. So you -- I'm guessing you finished reading that 25 facts -- scenario then?</p>

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20 (Pages 77 to 80)

<p style="text-align: right;">77</p> <p>1 A I'm saying that it doesn't matter which scenario you 2 show me. We don't need the Registry for that purpose. 3 People can find out vast amounts of information with 4 just a touch of their computer. 5 Q Why do you think people would want to know that 6 information? 7 A There is a tendency for people these days to check out 8 every single person that they have a relationship with, 9 and, you know, when you go on these other sites, you'll 10 see the little blurbs, oh, my God, I didn't know that 11 so and so was so and so. I'm glad I had this site, I'm 12 glad I found out this information. But it's out there. 13 It's out there. The Registry is not needed. 14 Q Do you think it's a bad thing that this information is 15 out there? 16 MS. CARBAJAL: Objection to form. 17 THE WITNESS: If someone is interested in the 18 lurid and sordid details of any information that they 19 find out about someone through one of these other 20 sources, then it's easy for them to do that. Because 21 you see these other sites will show where the person 22 was convicted. 23 And so while it's nothing, I'll get to -- I'll 24 look up the 30th Circuit Court. I'll look up the name 25 and see what happens. I'll get the information from</p>	<p style="text-align: right;">78</p> <p>1 the police agency. 2 Q (By Mr. Damich) Okay. 3 A There are many different ways of protecting the public 4 and they're all on the Internet. 5 Q And how do those things on the Internet protect the 6 public 7 MS. CARBAJAL: Objection to form. 8 THE WITNESS: How does, what? 9 Q (By Mr. Damich) How do those things on the Internet 10 protect the public? 11 MS. CARBAJAL: Objection to form. 12 THE WITNESS: I mean, I don't even know how to 13 answer that. I haven't got the slightest idea of how 14 to answer that. 15 Q (By Mr. Damich) I'm just repeating what you said, 16 though, sir. 17 A Huh? Can you -- is there a way you can rephrase that 18 or -- 19 Q Sure. 20 A -- clarify for me. 21 Q You finished up your last statement that all of that 22 information protects the public, and I asked you how 23 does that information protect the public. 24 MS. CARBAJAL: Objection to form. 25 THE WITNESS: How does it affect the public.</p>
<p style="text-align: right;">79</p> <p>1 I just -- I just can't answer that, because I'm telling 2 you that if someone wants to know about their next door 3 neighbor, they just have to get on their computer. If 4 they want to know about the lurid and sordid details of 5 any information they find, they can further investigate 6 by going to the police agency or going to the court 7 record. 8 Now, how does it affect the public? 9 Q (By Mr. Damich) Protect. Protect. 10 A I can't even comprehend that, I'm sorry. 11 Q Protect. Not affect. Protect. 12 A Protest? 13 Q Protect. How does it protect? 14 A Protect? 15 Q Yes. 16 MS. CARBAJAL: Same objections. 17 THE WITNESS: All of these various websites 18 protect the public by simply being there for people to 19 access. They don't the Registry. 20 People are constantly going on these other 21 sites, just to check out their friends, to see, oh, 22 let's find out what we can see about Alice, or Tommy. 23 This is something people do all the time. This is the 24 age of unprecedented, instant communication and 25 information about anything and everyone you want to</p>	<p style="text-align: right;">80</p> <p>1 know about. It's all there. 2 Q (By Mr. Damich) And you believe that information 3 protects the public? 4 MS. CARBAJAL: Objection to form. 5 THE WITNESS: This information affects the 6 public? 7 Q (By Mr. Damich) Protect. Do you believe that that 8 information protects the public?-- 9 A Yes. The Internet protects the public. It provides 10 the information that they're looking for. I believe 11 that that does, and there are ample examples of it when 12 you go on these various websites. These Spokeo, and 13 all these other crazy find-out-information websites 14 about what people say. 15 I've got it, I looked at the information, and, oh, 16 my God, I discovered this, I discovered that. That 17 protects the public. And it does a really good job. 18 Sometimes the Registry is down and you can't access it. 19 Man, you cannot -- you can access any of these other 20 websites 24 hours a day, they're never down. 21 So, no, these other websites protect the public and 22 probably as well or better than SORA. 23 Q So you do believe SORA protects the public? 24 MS. CARBAJAL: Objection to form. Asked and 25 answered.</p>

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21 (Pages 81 to 84)

<p style="text-align: right;">81</p> <p>1 THE WITNESS: I believe that it is one means 2 to protect the public, but it is not the end all and be 3 all of public protection. 4 Q (By Mr. Damich) Okay. 5 A On these other sites you can find out a person's phone 6 number, their email address, their current living 7 address, their crime information, their status as to 8 whether they have been bankrupt, whether they've paid 9 off their home loan, and what kind of medical 10 conditions they have. 11 You don't find anything but that on -- you know, on 12 SORA. I mean, SORA is just a drop in the ocean. But, 13 it's a drop in the ocean that hurts registered 14 offenders more than it protects the public. 15 Q Have you ever contacted a member of the Michigan 16 legislature to inquire about changing the Michigan 17 registration laws? 18 A I believe I have, and I believe that was three or four 19 years ago. And I -- it was in the context of finding 20 employment, and I believe at that time that I contacted 21 110 state representatives and 38 senators by email and 22 by phone. I didn't get much of a response. 23 Q Okay. So do you -- it's -- you fully understand it's 24 the legislature that changes the law? 25 A I have addressed that in various emails that I sent to</p>	<p style="text-align: right;">82</p> <p>1 each of those elected officials. 2 Q Sure. But, again, the question was -- let me rephrase. 3 Is it your understanding that the legislature is 4 the one that creates laws? 5 MS. CARBAJAL: Objection to form. 6 Mischaracterizes the testimony. 7 THE WITNESS: I understand that it's our state 8 representatives and state senators that introduce 9 legislation, and that it's voted on, and then 10 ultimately it's either vetoed or passed into law by the 11 Governor. 12 Q (By Mr. Damich) Okay. Do you know whether -- 13 A The legislators are the people you want to contact. 14 Q Okay. So you would agree that Governor Whitmer doesn't 15 have the power to change the sex offender law, correct? 16 A She had the power to prevent it into coming -- into 17 becoming law by the veto, and she chose not to veto it. 18 Q But currently, right now, as it stands today, 19 Government Whitmer does not have the power to change 20 the law, correct? 21 MS. CARBAJAL: Objection to form. 22 THE WITNESS: Provisionally, I'll say she 23 doesn't have the power to change the law, but she has 24 the chief law enforcement officer who represents her -- 25 represents her and the people of the State of Michigan,</p>
<p style="text-align: right;">83</p> <p>1 in reviewing state statutes which may be in violation 2 of the Constitution -- the State Constitution, and also 3 the Federal Constitution. That's why we have your 4 boss, who is absolutely outstanding. 5 Q Thank you. Do you -- I agree, as well. 6 Do you know whether Governor Whitmer can reduce the 7 registration periods? 8 A All of that has to be done through the legislature, 9 which has to review it all. 10 Q Okay. 11 A However, your boss carved in granite her own opinion of 12 the Sex Offender Registration Act. 13 Q Okay. Do you know -- what about Colonel Gasper, does 14 he have the power to change the Sex Offender 15 Registration law? 16 A Not at all, but the SORA Act has been challenged and 17 very well, in an amicus curiae brief that your boss 18 submitted the February the 8th, 2019, and she ripped 19 the law apart. 20 Q Do you know whether Colonel Gasper can reduce the 21 registration period? 22 A Whether -- 23 Q Colonel Gasper, can he reduce the registration period? 24 A No. I don't think he can reduce that. That's all the 25 legislature.</p>	<p style="text-align: right;">84</p> <p>1 Q Okay. 2 A But Attorney General opinions are very powerful, and 3 often binding. 4 MR. DAMICH: I don't have any further 5 questions. 6 MS. CARBAJAL: I don't have any questions 7 either. 8 THE WITNESS: No further questions? 9 MS. CARBAJAL: I have nothing also. Great. 10 MR. DAMICH: Well, sir, I truly hope you 11 understand it was a pleasure talking with you today. 12 And I appreciate you taking time out of your day, and 13 -- I know what it's like trying to herd kittens, I have 14 a couple of my own, and trying to have a long 15 conversation. So I appreciate your patience. I 16 appreciate you speaking with me today and, you know, I 17 hope you the best. 18 THE WITNESS: Thank you. I understand the 19 difficult situation you're in. It's not a walk in the 20 park, and I just hope that there is a reasonable 21 resolution to this situation, both for the public and 22 for registered sex offenders. 23 MR. DAMICH: And the victims as well, too. 24 (Whereupon the deposition was concluded at 25 about 12:54 p.m.)</p>

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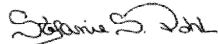
CERTIFICATE OF NOTARY - COURT REPORTER

STATE OF MICHIGAN)
)
COUNTY OF CLINTON)

I, Stefanie S. Pohl, a Notary Public in and for the above county and state, do hereby certify that this transcript consisting of 85 pages stenographically reported is a complete, true and correct record of the testimony of K.S. held in the case on Wednesday, May 31, 2023.

I also certify that prior to taking this deposition and by agreement of counsel, K.S. was duly sworn remotely to tell the truth.

I also certify that I am not a relative or employee of an attorney for a party or financially interested in the action.



Stefanie S. Pohl
CSR #5616
Notary Public, Clinton County,
Michigan
My Commission Expires: 6/21/25



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a.m 1:20 4:2 Aberdeen 2:3 ability 8:9,13 55:3 able 24:16 29:15 29:18 36:7 38:17,22 40:8 54:2,25 55:1,3 59:4 67:17 71:23 above-entitled 1:22 absolutely 36:19 36:19 39:19 45:7 48:2 70:25 72:20,21 75:23 83:4 abuse 52:24 accepted 22:1 access 76:3 79:19 80:18,19 accessible 71:10 accidentally 47:1 achieve 20:8 acknowledgem... 5:2 act 17:2 20:16 24:4 83:12,16 action 23:15,19 23:25 85:17 actions 60:14,21 activities 53:10 activity 14:25 15:17 16:1 33:1 addictions 52:24 addition 11:8 67:20 address 56:12 81:6,7 addressed 81:25 addresses 49:7 administration	24:6 administrative 21:12,15 46:9 73:16,17,19 adult 16:2,3 adults 15:2,4 advised 32:5 49:11 affect 8:9 78:25 79:8,11 affirm 5:6 Affirmative 23:14,19,25 age 12:20 14:10 14:13 16:16 27:10,12 30:2 76:13 79:24 agencies 45:20 agency 78:1 79:6 agent 32:5 agents 33:2 ages 13:1 27:7,10 27:14 28:4,9 ago 5:12 8:18,19 8:20 67:13,24 81:19 agree 82:14 83:5 agreement 85:13 ahead 8:5 37:4 58:10 65:2,11 65:12 67:1 alcohol 32:15,16 Alice 79:22 alive 50:5 68:6 allow 14:16 45:25 51:13 61:13 63:13 allowed 32:15 33:9,10,25 42:8 allows 71:25 amazing 55:3 amazingly 38:18 American 2:7 amicus 83:17	amount 38:21 53:9 amounts 53:3,10 77:3 ample 80:11 analysis 21:22 anger 52:23 answer 5:25 6:14 6:18,22 7:9 8:5 8:10,13 14:6 15:8 16:9 24:24 28:19 29:8 30:8 40:13 45:13,13 46:2 54:10 60:18 61:10 64:9,15 67:19 69:3,19 78:13 78:14 79:1 answered 15:22 26:24 27:4 54:6 54:9 61:12 80:25 answering 5:19 6:7 answers 17:8 56:2 anybody 47:21 apart 74:24 83:19 apartment 37:9 40:2,11 41:16 APPEARANC... 2:1 Appearing 2:5,9 2:14 applicant 41:14 application 47:12 48:1,5,10,12 applications 33:18,20,20,23 40:18,20,21 41:1,20,23 47:13 applied 22:1 34:4 34:5 41:17	44:16 45:18 49:14 apply 40:12 41:14 applying 19:16 20:15 34:2 46:6 appreciate 19:20 84:12,15,16 appreciated 19:20 approve 16:2 approximate 34:24 approximately 34:4 36:6 40:11 42:18 43:4,25 51:20 approximation 8:19 56:19 area 41:11 areas 40:2,3,5,7,8 arguably 31:16 argumentative 15:13 16:8,15 16:19 18:6,12 28:18,25 29:7 30:6,22 47:7 62:2 63:5 73:9 75:8 arrest 24:18 32:22 arrested 22:4,7 30:10 37:12 articulate 7:17 articulated 65:24 asked 7:12 15:21 26:23 27:4 28:8 41:1,4,8 48:5,14 54:6,8 78:22 80:24 asking 5:18,25 48:10 assaulted 60:11 61:25	assistant 2:11 4:10 47:14 assumed 15:1 assumes 30:18 attendant 46:12 attorney 2:11,12 4:10 84:2 85:16 attracted 16:6,12 30:2 attraction 16:17 17:7 August 31:23 35:1,14 available 53:19 71:9 76:12,20 Avenue 2:8 avoid 6:12 aware 58:14,16 58:18 Awesome 55:22 awhile 40:17
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